

REMARKS

This is in full and timely response to the above-identified Office Action. The above listing of the claims supersedes any previous listing. Favorable reexamination and reconsideration are respectfully requested in view of the preceding amendments and the following remarks.

Claim Amendments/Status

In this response, independent claims 1 and 5 have been amended to clarify the subject matter for which protection is sought over the cited art. Grammar and syntax of the dependent claims has been reviewed and amended. A new independent claim 13 has been presented for examination. Claims 1-13 therefore are pending in this application.

Support for the amendments is found in the originally filed specification and drawings. See pages 4 and 5 for example.

Amendments to the Specification

In this response the title and the abstract have been revised in manner believed to obviate the issues raised on pages 2-4.

Rejections under 35 USC § 112

The claims have been amended in accordance with current practice to clarify the subject matter is set forth. The examiner is informed that "[the]" for example is the preferred method of deleting words or the like which are 5 or less characters in length. Thus some of the objections re language are not well taken. The remaining issues are submitted as being overcome by the amendments to the claims noted above.

Rejections under 35 USC § 102

The rejection of claims 1, 3, 5 and 6 under 35 USC § 102(b) as being anticipated by the disclosure of Ramaswamy, et al is respectfully traversed. The claims have been amended in a manner which is submitted as overcoming the anticipation and such as to set forth subject matter which is neither disclosed nor suggested by the Ramaswamy, et al reference.

More specifically the claimed invention deals with a method and means for automatically producing voice recognition interfaces. It comprises two main steps:

- preparing input data (for the automatic execution means 6) , under the supervision of a human operator (using means 1 to 4 of figure 1),
- automatic production of voice interfaces by means 6.

Three important features are submitted as being found in the independent claims.

These are:

- The human operator uses for building the conceptual model, two main knowledge sources: the generic grammar 11 and the basic vocabulary 12 (see as filed specification page 5, lines 27-30),
- The data are inputted to means 6 only once the human operator has revised the phraseology (means 5) and produced explanations (means 5) (see page 4, line 37 to page 5, line 8). Thus, the producing means (6) may produce completely automatically voice interfaces without any need to perform iterations.
- The conceptual model comprises mutual relationships interlinking the data that are inputted by the operator through means 1 (see e.g. page 5, lines 23-26).

Ramaswamy, et al (USPN 6 188 976) discloses a method for building domain-specific language models, but the "linguistic units" (and test corpus 30) it uses are merely "sentences, paragraphs and phrases" (see e.g. column 2, lines 51, 52). Neither grammar rules nor mutual relationships are disclosed.

Therefore, the selection of the most pertinent linguistic units, which is performed by a computer, is based on a statistical method using relevance scores (see e.g. column 3, lines 37-63). This is obviously a "rough" method that may be difficult to be adapted to some languages and that is much less accurate than our one (according to which the data that are inputted to the computer 6 are wholly supervised by a human operator).

Rejections under 35 USC § 103

Claim 2 is rejected under 35 USC §103(a) as being unpatentable over Ramaswamy, et al., as applied to claim 1 above and further in view of Siu, Kai-Chung and Meng, Helen M. "Semiautomatic acquisition of domain-specific semantic structures", EUROSPEECH '99.

Claims 4 and 11 are rejected under 35 USC §103(a) as being unpatentable over Ramaswamy, et al., as applied to claim 1 above and further in view of Monaco, Peter C., USPN 6434523.

Claims 7, 12 and 10 are rejected under 35 USC §103(a) as being unpatentable over Ramaswamy, et al., as applied to claims 5, 6 and 3 above and further in view of Monaco, Peter C., USPN 6434523.

Claim 8 is rejected under 35 USC §103(a) as being unpatentable over Ramaswamy, et

al. and Meng, et al., as applied to claim 2 above and further as follows.

Claim 9 is rejected under 35 USC §103(a) as being unpatentable over Ramaswamy, et al., and Meng, et al. as applied to claim 2 above and further in view of Monaco, Peter C., USPN 6434523.

These rejections under 35 USC § 103(a) are summarily traversed in light of the amendments to the independent claims 1 and 5 and the traversal of the anticipation rejection based thereon. Further, the secondary references do not contain any disclosure or suggestion which might assist the hypothetical person to ascertain the claimed subject matter.

It is respectfully submitted that in order to establish a *prima facie* case of obviousness, it is necessary to show that the hypothetical person of ordinary skill would, without any knowledge of the claimed subject matter and without any inventive activity, be motivated to arrive at the claimed subject matter given the guidance of the cited references when each is fully considered as statutorily required.

USPN 6 434 523 to Monaco discloses a graphic tool that is not suited at all for automatically producing vocal recognition interfaces, since it merely discloses a tool for allowing an end-user to build grammar rules. It does not suggest the use of any reference language model.

This reference cannot be combined with the first because the latter does not use at all any grammar rule, and one skilled in the art would not know how to combine grammar rules with said "statistical method using relevance scores" disclosed in the first reference.

The other cited references are deemed still less relevant to present invention than the two discussed *supra*. These academic documents do not disclose any of the main means/techniques of the invention.

Conclusion

It is respectfully submitted that the claims as they have been amended and newly presented are allowable over the art which has been applied in this Office Action. Favorable reconsideration and allowance of this application are courteously solicited.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 07-1337 and please credit any excess fees to such deposit account.

Respectfully submitted,
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